

Exhibit “2”

Transcript of the Testimony of
Carissa Smith

Date:

March 04, 2020

Case:

Julia Teague vs Omni Hotels Management Corporation

Carissa Smith

March 04, 2020
Pages 22 to 25

<p style="text-align: right;">Page 22</p> <p>1 A. It -- no. It was not my role to do so. 2 (Exhibit 1 marked.) 3 Q. I'm going to show you what I'm marking as Exhibit 1. 4 If you'd like to take a look, and then ultimately flip to 241. 5 MS. POWITZKY: Thank you. 6 Q. Can you tell what these images appear to be? 7 A. These are text messages between me and Julia. 8 Q. And have you flipped to TEAGUE241? 9 A. I have. 10 Q. And can you tell what time period these text messages 11 are from on that Page 241 there? 12 A. February 2nd. 13 Q. Do you know when Julia gave birth? 14 A. I believe February 2nd, but I don't know for a fact. 15 Q. Do you see that text there that says, "Let me know if 16 you have any CS positions available. I have a rock star." 17 A. Yes. 18 Q. What is that text messages? 19 A. It is a -- looks like it was meant for someone else, 20 but I don't remember who. 21 Q. You don't remember sending that text message? 22 A. I do not remember sending that text message. 23 Q. Do you remember who you're referring to in that text 24 message? 25 A. I don't.</p>	<p style="text-align: right;">Page 24</p> <p>1 MS. POWITZKY: Objection. Form. 2 A. Yes. 3 Q. You considered Julia a legitimate candidate for that 4 position? 5 A. Yes. 6 Q. When the director of marketing position was re-hired, 7 it had the same title as when Julia held it? 8 A. Yes. 9 Q. Julia had been -- how long had Julia been in the 10 director of marketing position, in your understanding? 11 A. I believe since she started. Well, I know that when 12 she first started and the property was owned by KSL, I believe 13 her title was director of marketing communications, and Omni 14 commonly refers to their marketing roles as just director of 15 marketing. So she held the title of director of marketing 16 since the acquisition, is my understanding. 17 Q. Okay. As long as you've been there, effectively? 18 A. Yes, uh-huh. 19 Q. Was she a good director of marketing? 20 A. She was a good director of marketing, and based on 21 our level of expectations -- 22 Q. Okay. 23 A. -- at that time. 24 Q. And -- so that would be -- in your opinion, was she a 25 good director of marketing?</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Can you tell what you're trying to do in that text 2 message? 3 A. I would have to understand the context of the text 4 message to say that. I know that in my role, I not only manage 5 people but I also hire people. I do know that our human 6 resources department was responsible for relocating people. I 7 don't know the circumstances around this. I can't remember 8 what the conference services people did in the reduction in 9 force. We had some people stay through April 30th, but I can't 10 remember how many. 11 Q. Got you. 12 CS there. Would you say that's conference 13 services? 14 A. Yes. 15 Q. So it looks like you're potentially trying to find a 16 conference service position for someone? 17 A. Yes, that appears to be the case. 18 Q. Is that -- do you know if that someone was someone 19 that was included in the reduction in force? 20 A. I don't know. 21 Q. Switching gears a little bit, I'd like to talk about 22 the re-hiring of the director of marketing position. 23 A. Uh-huh. 24 Q. Was Julia considered as a legitimate candidate for 25 the director of marketing position?</p>	<p style="text-align: right;">Page 25</p> <p>1 MS. POWITZKY: Objection. Form. 2 A. In my opinion, her performance reviews state a very 3 comprehensive feedback on Julia. Over all, while every one has 4 room for improvement, over all, for what we needed, she was a 5 good director of marketing. 6 Q. Were you involved in the hiring decision for the 7 director of marketing role? 8 A. Initially I was. And I -- initially, I was tasked 9 with filling the position. At one point, that responsibility 10 was removed from me. And it was going to go to a general 11 manager to make the decision, in the absence of a GM that went 12 to our corporate marketing department. Although I was able to 13 provide recommendations, I was not the ultimate decision maker 14 for the final candidate that was hired. 15 Q. Who was the ultimate decision maker for that 16 candidate? 17 A. Our general manager would have been the ultimate 18 decision maker. 19 Q. And who was the GM at that time who made the 20 decision? 21 A. Todd Raessler had just begun with the hotel. 22 Q. You said initially you were involved in the hiring 23 decision? 24 A. Correct. 25 Q. What was that? What's the initial time period that</p>

Carissa Smith

March 04, 2020
Pages 134 to 137

		Page 134	Page 136
1	SIGNATURE PAGE		
2	WITNESS NAME: CARISSA SMITH		
3	DATE: WEDNESDAY, MARCH 4, 2020		
4	PAGE LINE CHANGE	REASON	
5	_____		
6	_____		
7	_____		
8	_____		
9	_____		
10	_____		
11	_____		
12	_____		
13	_____		
14	_____		
15	_____		
16	_____		
17	_____		
18	_____		
19	_____		
20	_____		
21	_____		
22	_____		
23	_____		
24	_____		
25	_____		
		Page 135	Page 137
1	SIGNATURE PAGE		
2	I, CARISSA SMITH, have read the foregoing deposition		
3	and hereby affix my signature that same is true and correct,		
4	except as noted on the correction page.		
5	_____		
6	CARISSA SMITH		
7	_____		
8	THE STATE OF _____)		
9	COUNTY OF _____)		
10	Before me _____ on this day		
11	personally appeared _____ known to me [or		
12	proved to me on the oath of _____ or through		
13	_____ (description of identity card or other		
14	document)] to be the person whose name is subscribed to the		
15	foregoing instrument and acknowledged to me that he/she		
16	executed the same for the purposes and consideration therein		
17	expressed.		
18	Given under my hand and seal of office this		
19	____ day of _____, 2020.		
20	_____		
21	NOTARY PUBLIC IN AND FOR		
22	THE STATE OF _____		
23	_____		
24	My Commission Expires: _____		
25	_____		